

2026

re:shape

Shadow Habitat Regulations Assessment

Ashley Park





Ashley Park Shadow Habitat Regulations Assessment

Prepared for:
Re:shape T Ltd

Date:
August 2026

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INTRODUCTION

Background

- 1 Trium Environmental Consulting LLP was appointed by Re:shape T Ltd (hereinafter referred to as the 'Applicant') to undertake a Shadow Habitats Regulations Assessment (sHRA) for the redevelopment of the former Ashley House site in the London Borough of Haringey. The purpose of this assessment is to evaluate the potential adverse effects on European designated sites within the Site's Zone of Influence (Zoi).

Habitat Regulations Assessment Process

- 2 The Conservation of Habitats and Species Regulations 2017 (as amended)¹, which transposes the Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (the 'Wild Birds Directive') and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') into national statute, requires competent authorities to complete an appropriate assessment of any plan or project which is likely to have a significant effect on a European site (either alone or in-combination with other plans or projects) and is not directly connected with or necessary for the management of the site, to determine the implications for the site in view of its conservation objectives.
- 3 Department for Environment, Food and Rural Affairs (Defra) guidance² identifies that the Habitat Regulations Assessment (HRA) process comprises up to 3 stages, with the need for assessment at each stage dependent upon the findings of the previous stage. The three stages of the HRA process are:
 - Stage 1: Screening;
 - Stage 2: Appropriate Assessment;
 - Stage 3: Derogation.

Stage 1: Screening

- 4 The purpose of the first stage of the HRA process, screening, is to determine whether the project or plan is directly connected with or necessary for the conservation management of a European site and if any part of the Proposed Development risks having a significant effect on any European site, either on its own or in combination with other plans or projects. In line with the Court of Justice of the European Union (People Over Wind and Sweetman vs Coillte Teoranta (C-323/17), 2018), in which it was concluded that '*measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by a competent authority at the Habitat Regulations Assessment screening stage when judging whether a proposed plan or project is likely to have significant effects on the integrity of a European designated site*', Defra guidance³ requires screening to not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site.

¹ The Conservation of Habitats and Species Regulations 2017 (as amended). His Majesty's Stationary Office (HMSO).

² Department for Environment, Food and Rural Affairs (2021) Habitat regulations assessments: protecting a European site. Accessed at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> on 16/06/2026.

³ Department for Environment, Food and Rural Affairs (2021) Habitat regulations assessments: protecting a European site. Accessed at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> on 16/06/2026.

- 5 The Conservation of Habitats and Species Regulations 2017 (as amended) makes reference to the consideration of likely significant effects of a project or plan on one or more European sites, which is identified in the Regulations to comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and includes those under consideration for designation. Additionally, national planning policy provided by the National Planning Policy Framework (NPPF)⁴ expects those under consideration for designation, i.e. potential SPAs (pSPAs) and candidate SACs (cSACs), Ramsar sites and areas identified to provide compensatory sites, to be considered through the HRA process.
- 6 The legislation/agreement governing the designation of sites are:
- SACs – designated under the Conservation of Habitats and Species Regulations 2017 (as amended), which transposes European Council Directive 92/43/EEC ‘on the conservation of natural habitats and of wild fauna and flora’ (also known as the ‘Habitats Directive’), targeting particular habitats (listed on Annex I) and/or species (listed on Annex II) that are identified as being of European importance;
 - SPAs – classified under the Conservation of Habitats and Species Regulations 2017 (as amended), which transposes European Council Directive 09/147/EC ‘on the conservation of wild birds’ (also known as the ‘Birds Directive’), for the protection of wild birds and their habitats, including particularly rare and vulnerable species listed in Annex I of the Directive and migratory species;
 - Ramsar – listed under the Convention on Wetlands of International Importance (Ramsar Convention, 1971) as sites that support important wetland habitats and species, especially waterfowl habitat;
 - Compensatory Sites – sites that have been identified to provide compensatory habitat for that impacted by plans or projects permitted through the imperative reasons of overriding public interest test (Test 2 of the Derogations stage).
- 7 For ease of reference, these designations are collectively referred to within this assessment as European sites, despite Ramsar designations being made at the international level. SPAs and SACs are also referred to in guidance documents as ‘Natura 2000’ sites.
- 8 If the Screening Assessment concludes that significant effects are likely, the HRA process should move onto the second stage of the HRA process – Appropriate Assessment.

Stage 2: Appropriate Assessment

- 9 Appropriate Assessment considers whether or not the project/plan, alone and in-combination with other plans and projects, would adversely affect the integrity of the European site(s) identified in the screening assessment.
- 10 The appropriate assessment must demonstrate whether an adverse effect on the integrity of the site from the proposal can be ruled out or not, with the integrity adversely affected where a proposal could, for example:
- Destroy, damage or significantly change all or part of a designated habitat;
 - Significantly disturb the population of a designated species, for example its breeding birds or hibernating bats;
 - Harm the site’s ecological connectivity with the wider landscape, for example, harm a woodland that helps to support the designated species from a nearby European site;
 - Harm the site’s ecological function, or its ability to survive damage, and reduce its ability to support a designated species;

⁴ Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework. February 2025.

- Change the site's physical environment, for example by changing the chemical makeup of its soil, increasing the risk of pollution or changing the site's hydrology;
- Restrict access to resources outside the site that are important to a designated species, for example, food sources or breeding grounds; and,
- Prevent or disrupt restoration work, or the potential for future restoration, if it undermines the site's conservation objectives.

11 Defra guidance⁵ identifies that the assessment and application of the integrity test should consider:

- The ecological requirements, conservation objectives and the current conservation status (if known) of the site's designated features that might be affected by the proposal;
- Each potential effect on the European site, including the risk of combined effects with other proposals, and how they might impact on the site's conservation objectives;
- The scale, extent, timing, duration, reversibility and likelihood of the potential effects;
- How certain you are of the effects occurring;
- Mitigation measures that have been proposed or conditions you can attach to avoid or limit the effects;
- How confident you can be that mitigation measures will be effective over the whole lifetime of the proposal - for example, the effects of construction, operation and decommissioning.

12 Mitigation measures can be considered in the assessment of adverse effects and their impact on the integrity of the site and should demonstrate how measures proposed would be implemented and monitored, how measures would be enforced (if applicable), certainty that the measures will be effective in avoiding or reducing adverse effects, how long measures would take to be effective and the level of success expected.

13 Consultation with the Statutory Nature Conservation Body, Natural England, should be carried out on the draft Appropriate Assessment and consider the advice received.

14 If the assessment demonstrates that, with the application of mitigation measures, there is no reasonable scientific doubt that the proposals will not have an adverse effect on the integrity of the site then the HRA process can conclude at this stage. However, if the assessment cannot rule out an adverse effect on site integrity, then the HRA process should proceed to the third stage of the HRA process, Derogation, or should be refused.

PROJECT DESCRIPTION

Project Determination

15 Whilst neither the Habitats Directive nor the Conservation of Habitats and Species Regulations 2017 (as amended) provide a definition of what constitutes a project, the guidance provided by Defra⁶ identifies that a project should be considered as *'any activity or a number of activities that either needs a new or renewed permission from a competent authority before it goes ahead or that a competent authority proposes to carry out itself. It can also include proposals to change an existing project'*.

⁵ Department for Environment, Food and Rural Affairs (2021) Habitat regulations assessments: protecting a European site. Accessed at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> on 16/06/2026.

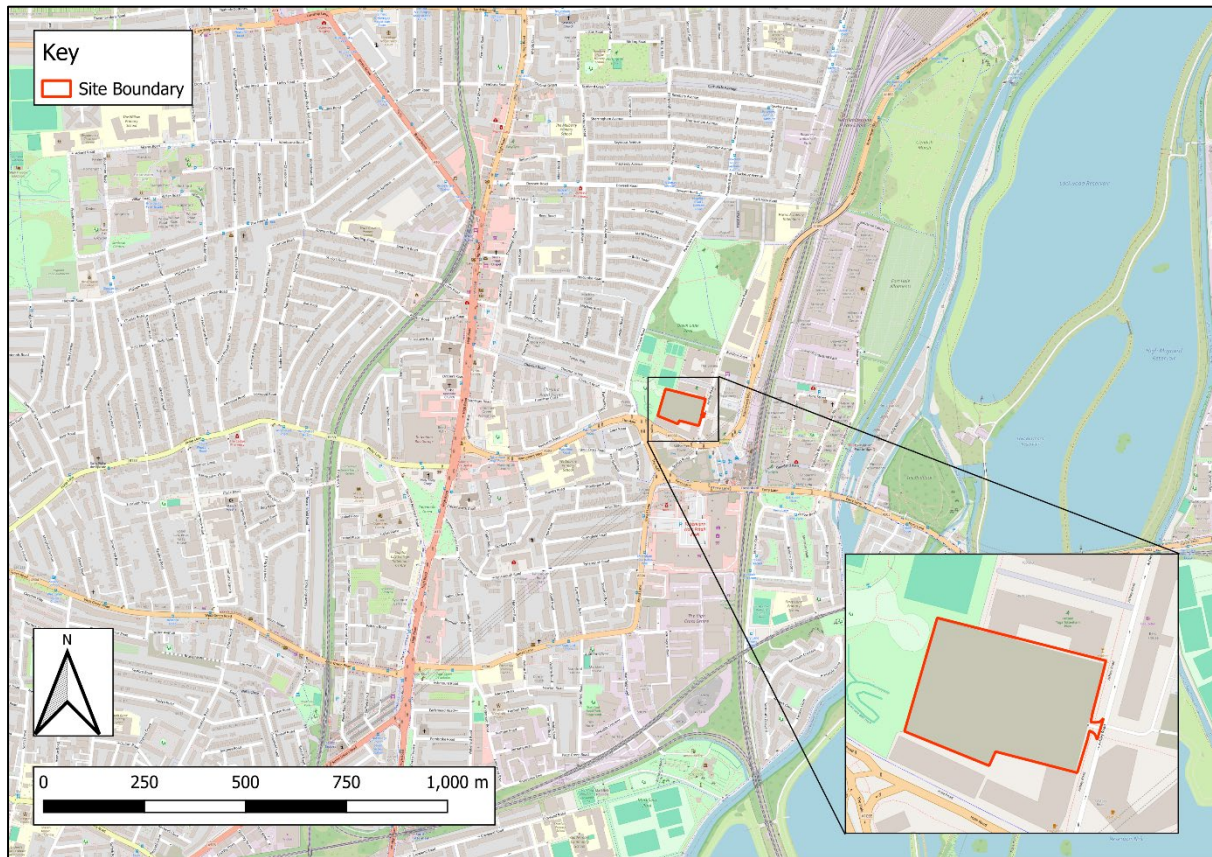
⁶ Department for Environment, Food and Rural Affairs (2021) Habitat regulations assessments: protecting a European site. Accessed at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> on 16/06/2026.

- 16 European Commission guidance⁷ highlights that, under Article 6 of the Habitats Directive, for a project or plan to be '*directly connected with or necessary to the management of the site*', the '*management*' component must refer to management measures that are for conservation purposes and the '*directly*' element refers to measures that are solely conceived for the conservation management of a site and not direct or indirect consequences of other activities.
- 17 The proposed mixed-use residential-led development is, therefore, considered to be a project and is not directly connected with or necessary to the management of a European site.

Project Location

- 18 The Site is located in the Tottenham Hale area of the London Borough of Haringey, with the existing Site comprising vacant brownfield land, with the previous existing buildings having been demolished in August 2023.
- 19 The Site is located to the west of Ashley Road, south of the Rosa Luxemburg residential building, east of Down Lane Park and north of a number of residential properties along Hale Road, covering a total area of 0.7 hectares (ha). The Site location is identified in Figure 1.

Figure 1 Proposed Development Location Plan (Contains map data from OpenStreetMap)



⁷ European Commission (2000) Managing Natura 2000 Sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

Project Requirement

- 20 Housing supply continues to be a key issue, with the demand for housing far exceeding the existing stock nationally and locally. The NPPF⁸ identifies the need for local authorities to secure sufficient amount of land to meet the Government's objective of significantly boosting the supply of homes that come forward where it is needed and that meets the specific housing requirements for that area.
- 21 The Haringey Local Plan: Strategic Policies (consolidated 2017)⁹ sets out a strategy to manage population growth by directing new development to suitable, accessible locations under Policy SP1 ('Managing Growth') and Policy SP2 ('Housing'). The Plan aims to meet an Objectively Assessed Need (OAN) of 1,345 homes per year and achieve a strategic requirement of at least 19,802 net new homes between 2011 and 2026, aligning with regional targets that increased the borough's annual requirement from 820 to 1,502 homes per year. This spatial growth strategy was evaluated through a Habitats Regulations Assessment (HRA) screening, which concluded that the Local Plan's policies and housing targets would not have likely significant effects on European protected ecological sites or species.
- 22 To address local housing pressures, Local and London Plan policy seeks the delivery of affordable homes, which the scheme supports on site through the redevelopment of an underutilised urban brownfield site for housing delivery in the form of shared living and C3 social rent homes and aligns with the Local Plan's focus on efficient land use.
- 23 The proposal delivers a dedicated six-storey block with up to 87 affordable homes (Use Class C3), alongside a block rising to 23 storeys providing 522 shared-living units (Sui Generis). It also includes 355m² of commercial, employment, and community space (Use Class E and F2) across the ground floor levels, satisfying Policies SP8 ('Employment') and SP10 ('Town Centres') by supporting the local economy and demonstrating clear alignment with local planning policy.

The Proposed Development

- 24 The Proposed Development comprises: *'Mixed use development comprising residential accommodation (Class C3) and shared living accommodation (Sui Generis) alongside commercial/community floorspace (Class E/F2) and public realm, blue-badge and cycle parking, open space, hard and soft landscaping and all other associated works'.*

IDENTIFICATION OF EUROPEAN SITES

- 25 Adverse effects resulting from development proposals can often extend beyond the boundaries of the project, particularly in relation to increase recreational pressure stemming from new residential provision. As a result, consideration is given to two European sites of relevance to the project:
 - Epping Forest SAC; and
 - Lee Valley SPA and Ramsar.
- 26 Epping Forest SAC covers an area of 1,630.74 ha that straddles the borders of Essex and Greater London, with the main area of forest stretching from Epping in the north, to Chingford on the edge of Greater London. The Forest narrows into a green corridor further south of Chingford which extends into east London. Epping Forest SAC is located approximately 4.5 km to the east of the Site at its closest.
- 27 Lee Valley SPA and Ramsar covers an area of 451.29 ha and 447.87 ha respectively and comprise a series of wetlands and reservoirs in north-east London on the western side of Walthamstow. Lee Valley SPA and Ramsar is located approximately 575 m to the east of the Site at its closest.

⁸ Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework. February 2025.

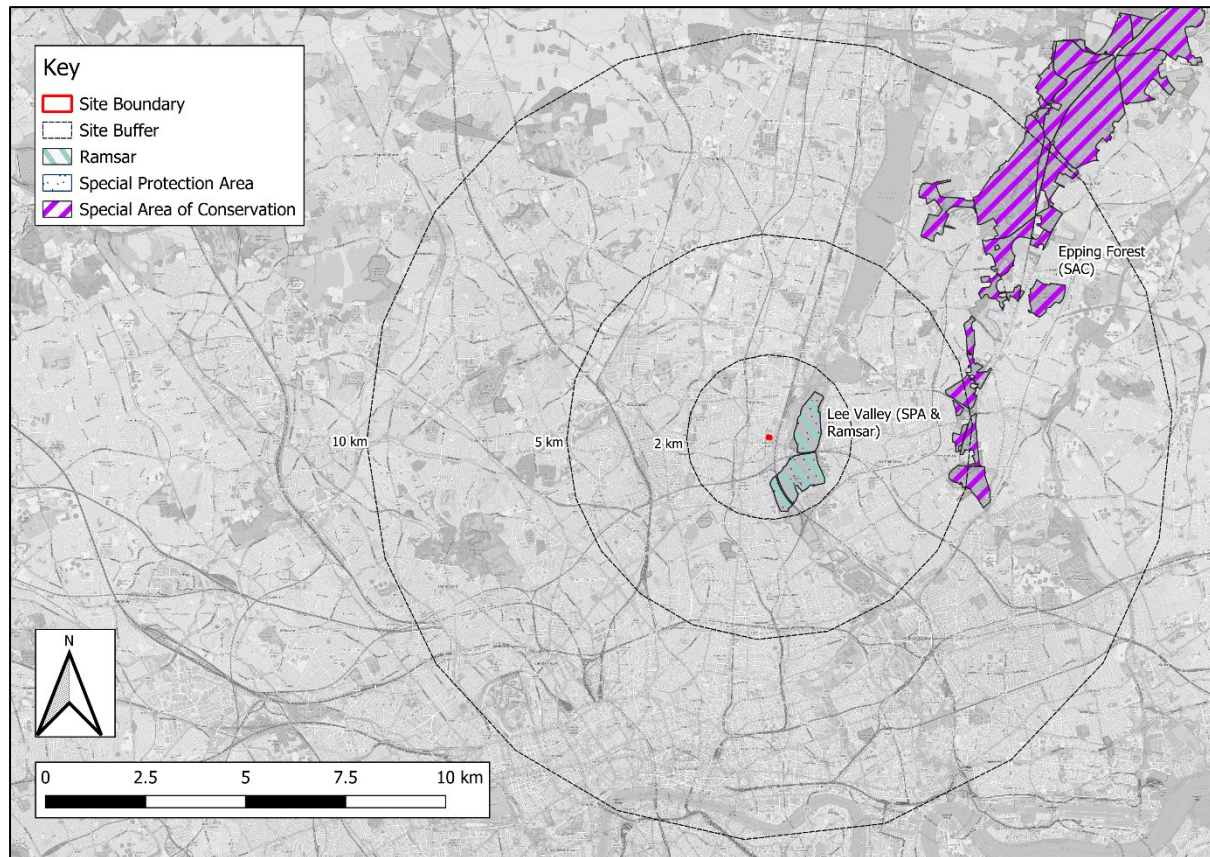
⁹ London Borough of Haringey (2013) Haringey's Local Plan Strategic Policies 2013-2026 (formerly the Core Strategy), March 2013

- 28 The citation for each of the European designations are provided in Table 1 with the location of the European site in relation to the Proposed Development identified in Figure 2.

Table 1 Summary of Designated Sites' Qualifying Features

Site	Designation	Reasons for Designation
Epping Forest	Special Area of Conservation (SAC)	Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) – the presence of this Annex I habitat within the site is a primary reason for the designation of the site, representing the habitat in the north-eastern part of the habitat's UK range. Although epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates. Stag beetle (<i>Lucanus cervus</i>) – the presence of this Annex II species within the site is a primary reason for designation of the site, with the large woodland area of Epping Forest providing habitat in which records of the species are widespread and frequent. Northern Atlantic wet heaths with <i>Erica tetralix</i> – the presence of this Annex I habitat within the site comprises a qualifying feature but not a primary reason for designation. Wet heaths typically occur on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage. The vegetation is typically dominated by mixtures of cross-leaved heath (<i>Erica tetralix</i>), heather (<i>Calluna vulgaris</i>), grasses, sedges and <i>Sphagnum</i> bog-mosses. European dry heaths – the presence of this Annex I habitat within the site comprises a qualifying feature but not a primary reason for designation. European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Ericaceous dwarf-shrubs dominate the vegetation, the most common is heather (<i>Calluna vulgaris</i>) or bell heather (<i>Erica cinerea</i>) though other dwarf shrubs are important locally.
Lee Valley	Special Protection Area (SPA)	Article 4.1 – The site is used regularly by 1% or more of the Great Britain population of a species listed on Annex I, in any season: bittern (<i>Botaurus stellaris</i>) (6% of GB population) during the winter. Article 4.2 – The site is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex I), in any season: shoveler (<i>Anas clypeata</i>) (1.0% of NW/Central Europe population) and gadwall (<i>Anas strepera</i>) (1.5% of NW Europe population), both during the winter. In addition, the site supports nationally important numbers of cormorant (<i>Phalacrocorax carbo</i>), great crested grebe (<i>Podiceps cristatus</i>), tufted duck (<i>Aythya fuligula</i>), pochard (<i>Aythya ferina</i>) and grey heron (<i>Ardea cinerea</i>) as non-qualifying species of interest.
	Ramsar	Criterion 2 - The site supports the nationally scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman). Criterion 6 – The site supports species/populations at levels of international importance, including northern shoveler with peak counts in the spring/autumn and gadwall with peak counts in the winter.

Figure 2 **Designated Sites within the Zone of Influence** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



29 The conservation objectives for the designations comprises:

- SAC: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:
 - The extent and distribution of qualifying natural habitats;
 - The structure and function (including typical species) of qualifying natural habitats; and,
 - The supporting processes on which qualifying natural habitats rely;
- SPA: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
 - The extent and distribution of the habitats of the qualifying features;
 - The structure and function of the habitats of the qualifying features;
 - The supporting processes on which the habitats of the qualifying features rely;
 - The population of each of the qualifying features; and,
 - The distribution of the qualifying features within the site.

30 Whilst Ramsar sites do not have defined conservation objectives, the sites are all covered by SPA designation with the objectives associated with the SPA designation appropriate for the overlapping Ramsar features. As a result, these conservation objectives have been applied additionally to the Ramsar designation for the purposes of this assessment.

SCREENING

Threats to European Sites

- 31 As the European sites are relatively similar in nature, they are subject to a number of overlapping threats which impact, or have the potential to impact, upon the qualifying features of the designated sites. The activities that have potential to give rise to both positive and negative impacts are identified in the designation forms (Natura 2000 data forms for SACs and SPAs and Information Sheets for Ramsar sites, accessed through the Joint Nature Conservation Committee) and have been summarised in Table 2.

Table 2 Summary of Negative and Positive Influences/Impactors upon European Sites

Site	Designation	Negative Impactors	Positive Impactors
Epping Forest	SAC	- Human induced changes in hydraulic conditions; - Grazing (excessive); - Outdoor sports and leisure activities, and recreational activities; - Air pollution/air-borne pollutants; and - Changes in biotic conditions.	- Grazing (effective management); - Forest and plantation management and use; and - Modification of cultivation practices.
Lee Valley	SPA	- Human induced changes in hydraulic conditions; - Pollution to groundwater (point sources and diffuse sources); - Outdoor sports and leisure activities, recreational activities; - Biocenotic evolution/succession; and, - Marine and freshwater aquaculture.	- Forest and plantation management and use; - Improved access to site; - Modification of cultivation practices; - Interpretative centres; and - Grazing (effective management).
	Ramsar	Recreational sport and tourism – angling, walking, cycling, and boating.	- Environmental education/interpretation; - Scientific research and conservation.

- 32 Recreational pressure is identified to be a negative impactor upon each of the European sites. Both Epping Forest and Lee Valley Regional Park provide significant recreational resources for local residents, with natural environments subject to high recreational pressures inevitably resulting in conflicts between visitor interest and conservation objectives and the behaviour of fauna often adversely impacted in the absence of control measures. Therefore, with additional residential accommodation introduced by the Proposed Development, and the associated demand for recreation and open greenspace, further consideration is required in relation to the potential for likely significant effects.
- 33 Whilst the Proposed Development is proposed to be car free, the provision of 10 Blue Badge parking spaces and requirement for servicing/deliveries will result in vehicle movements serving the development, which Transport Consultants predicts to generate a total of 79 Annual Average Daily Traffic (AADT). The proposals will implement an all-electric energy strategy that would not produce any on-site emissions. As air pollution is identified as a negative impactor for Epping Forest SAC, further consideration is given below to the potential for likely significant effects. However, as air quality is not identified as a negative impactor for Lee Valley SPA and Ramsar further consideration is not required for this European site.
- 34 With the key aspects of residential-led development being recreation and air pollution associated with vehicular traffic, there are no further activities associated with the development that are considered likely to give rise to significant effects. The remaining negative impactors are not considered to be of relevance in relation to the Proposed Development and thus can be excluded on the basis of no likely significant effects from the Proposed Development:
- Human induced changes in hydraulic conditions associated with the European sites are not considered likely considering the proximity of the development to the European sites and its urban context. Development of the site and associated construction activities are not considered likely to alter water cycles, flow regimes or groundwater systems associated with the European sites;

- Similarly, any impacts to groundwater associated with the Proposed Development will not impact upon the Lee Valley SPA and Ramsar, with no impact pathways present and the Site falling downstream in the Lee Valley;
- Marine and freshwater aquaculture relates to the farming of aquatic organisms within the reservoirs of Lee Valley SPA and Ramsar, with the Proposed Development not influencing this practice;
- Biotic conditions associated with Epping Forest SAC are unlikely to be affected, considering the proximity of the development to the European site and its urban context with no impact pathways present;
- Biocenotic evolution and succession relates to long-term changes to the biotic community within Lee Valley SPA, with no impact pathways from the Proposed Development influencing this; and
- Agricultural activities such as grazing are not relevant to the Proposed Development and therefore are not considered to have a likely impact on the designations as a result.

- 35 Although not identified as a negative influence/impactor on the designated sites, considering the proximity of the Site to the Lee Valley SPA and Ramsar there is some potential for adverse effects upon the designated site that are considered further below.

Assessment of Likely Significant Effects

Recreation

Epping Forest

- 36 Natural England advice¹⁰ to a number of London Boroughs in March 2019 recommended a 6.2 km ZoI for the consideration of whether recreational impacts from new residential development have an adverse effect on Epping Forest SAC. The 6.2km Zone of Influence is also referenced in Haringey Council's emerging Local Plan (Part 3: Borough-Wide Policies) and its supporting Habitats Regulations Assessment (HRA), which establish the 6.2km Zone of Influence, with the proposed development located 4.5 km from the European site and set out the mitigation requirements for residential proposals within the Borough.
- 37 The main recreational threats facing the Epping Forest SAC includes soil compaction, trampling and erosion which can lead to loss of soil structure and aeration, leading to reduction in vegetation, fungi, tree and shrub regeneration in the habitat structures. Additional threats include nutrient enrichment (especially from dog waste), disturbance and fragmentation effects and disturbance to deadwood and stag beetle habitat.
- 38 The Proposed Development will provide 522 shared-living units and 87 affordable homes, together with commercial/employment and community floorspace, landscaping and new public realm, including children's playspace. However, the context of the site should also be considered, with the Site well placed for local outdoor recreation, situated directly adjacent to Down Lane Park, with extensive regional greenspaces such as the Lee Valley Regional Park, Tottenham Marshes, and Markfield Park all in close proximity and providing a wide range of accessible recreational opportunities.

¹⁰ Natural England (2019) Letter to London Borough of Newham: Emerging strategic approach relating to the Epping Forest Special Area of Conservation (SAC) Mitigation Strategy. Interim advice following feedback from London Borough's and Greater London Authority. Natural England Reference 259129, 6th March 2019.

- 39 The latest Visitor Survey¹¹ for Epping Forest identifies estimated visitor numbers to Epping Forest to be around 4.2 million each year, based on information from the Management Plan consultation in 2014, although the City of London identify total visits to exceed 10 million in 2023 based on a new method of surveying visitors¹². However, the London Borough of Haringey is not a significant source of visitors to the SAC, as only a small part of the borough falls within the 6.2 km ZOI, with less than 1% of visitors originating from the Borough¹³.
- 40 Applying the GLA's Population Yield Calculator¹⁴ to the Proposed Development's traditional residential unit mix, paired with the assumption that shared-living units will have one single, working-age occupant per unit, the Proposed Development is expected to house a population of 783 residents. This includes 261 residents across the Proposed Development's traditional residential units and 522 residents in the shared-living units
- 41 Considering the number of visitors each year, conservatively using the 4.2 million visitors figure, an increase of 783 residential receptors would comprise a maximum increase of 0.0186% in visitor numbers. An increase of this magnitude is unlikely to have a discernible effect upon Epping Forest SAC, and considering the proximity of the Site to alternate recreational resources the Proposed Development is not considered likely to have significant effects 'alone'.

Lee Valley

- 42 Whilst recreational pressures are identified as a potential threat to the Lee Valley SPA and Ramsar, access to much of the site is subject to controls with the King George V and William Girling Reservoirs accessible by permit from Thames Water only whilst the remainder of the site is managed by the London Wildlife Trust as the Walthamstow Wetlands. The Walthamstow Wetlands are managed to balance recreational pressures and biodiversity, with the Walthamstow Wetlands Annual Bird Monitoring Report¹⁵ identifying that access is managed to limit access to the site's 'core' areas to allow for wildfowl refuge areas. Consequently, only 44% of the reservoir edges are accessible to the public during the summer months (April-July) and 39% accessible in winter months (August-March) to reduce the recreational impacts on the birds and habitats on site. Furthermore, there are vegetated screens and the Coppermill Stream in the south reservoirs that act as buffers to audible disturbance. Visitor monitoring (and the recreational impacts that follow) is closely monitored and reviewed as part of a 10-year report and as identified the most sensitive areas that are used by the SPA species have been protected from disturbance through careful control of access across the site.
- 43 Additionally other measures have been implemented by the Lee Valley regional park authority in their biodiversity action plan 2013-2029¹⁶. Within this Action Plan it outlines Catchment Management Plan for river conservation and have enforced a zonation of recreational activities to 'enable a range of activities to sit alongside the ecological importance of waterbodies. The zonation of recreational activities and conservation management plans includes the creation of refuges on certain lakes for example sailing in the Holyfield Lake and King George V reservoir is not permitted across the whole areas.
- 44 As a result, considering the restrictions on visitor pressures in place and mitigation strategies identified, along with the context of the Proposed Development with a range of greenspaces in close proximity,

¹¹ Liley, D. (2020) Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council.

¹² City of London (2023) Epping Forest set to break records by exceeding 10 million visits in 2023. 15 June 2023. Accessed through <https://news.cityoflondon.gov.uk> on 16/06/2026.

¹³ Liley, D. (2020) Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council.

¹⁴ GLA (2019). GLA Population Yield Calculator (v3.2).

¹⁵ London Wildlife Trust (2024) Walthamstow Wetlands Bird Monitoring report Year 9: April 2023 to March 2024.

¹⁶ Lee Valley Regional Park Authority (2019). Lee Valley Regional Park Biodiversity Action Plan 2019-2029 (2019)

the Proposed Development is not considered likely to have a significant effect on the Lee Valley SPA and Ramsar.

Air Quality

Epping Forest SAC

- 45** The Institute of Air Quality Management (IAQM) guidance¹⁷ on air quality impacts on designated nature conservation sites sets out the scope in which sites should be considered for impacts from road traffic. The IAQM guidance identifies that quantitative air quality assessment is required where European sites are within 200 m of affected roads, therefore any sites outside of this distance are unlikely to result in likely significant effects (LSE). The guidance also identifies traffic screening criteria, with changes in Annual Average Daily Traffic (AADT) on a given road of 1,000 vehicles or 200 Heavy Duty Vehicles (HDV) comprising the threshold for screening out the need for quantitative assessment, with traffic changes below this value unlikely to result in a 1% change in critical loads/levels which is identified in the IAQM guidance as widely used to define a reasonable quantum of long-term pollution which is not likely to be discernible from fluctuations in background/measurements.
- 46** The Proposed Development will be car-free, albeit with 10 Blue Badge parking spaces and associated servicing and deliveries. As a result, based on the traffic data provided by the Transport Consultant, the Proposed Development is not expected to generate a change of more than approximately 79 Annual Average Daily Traffic (AADT), with development trips distributed evenly across the local highway network and of which 1.3% would be HDV and the remainder Light Duty Vehicle (LDV) movements. As such, this change in AADT falls substantially below the IAQM screening threshold of 1,000 vehicles AADT, and the Proposed Development is unlikely to result in a significant effect upon local air quality. Furthermore, with the implementation of an all-electric energy strategy that does not produce any on-site emissions, the Proposed Development will not have likely significant effects upon the SAC, SPA and Ramsar sites as a result of changes in air quality.
- 47** Construction traffic generation is identified to comprise a peak of 18 HDV trips during construction. This falls significantly below the 200 AADT threshold for HDV such that the Proposed Development will not have likely significant effects upon the European sites as a result of changes in air quality. Therefore, the Proposed Development will not have likely significant effects upon the SAC, SPA and Ramsar as a result of changes in air quality.

Noise

Lee Valley SPA and Ramsar

- 48** Whilst there is potential for adverse impacts associated with noise generated during construction, considering the distance of the site from the SPA and Ramsar any noise generation within the Site is expected to have attenuated to a level below that of the ambient noise levels in the surrounding area. Across a distance of 575m, noise levels of 70 to 75 dBA at the boundary in line with noise level restrictions would be expected to attenuate to approximately 45 to 50 dBA at worst across this distance, with the ambient noise levels for the site, identified in the Noise and Vibration Assessment accompanying the application and taken to provide an indicative ambient noise level for the area, identified to be around 50 to 55 dBA.
- 49** As a result, the generation of noise from the Proposed Development is not anticipated to have likely significant effects upon the Lee Valley SPA and Ramsar.

¹⁷ Holman et al (2020) *A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1.* Institute of Air Quality Management, London.

Assessment of Likely Significant In-Combination Effects

Recreation

Epping Forest SAC

- 50 As set out above, the Proposed Development's anticipated increase of 783 residential receptors equates to a maximum increase of approximately 0.0186% of the 4.2 million annual visitors to Epping Forest SAC, with less than 1% of visitors to the SAC originating from the London Borough of Haringey in any event. Even allowing for a reasonably cautious view of cumulative growth from other committed development within the 6.2 km Zol, the Proposed Development's own contribution to that cumulative total remains negligible, particularly having regard to the Site's car-free nature, which limits ease of access to the SAC by private vehicle, and the ready availability of accessible alternative greenspace immediately adjacent to and within walking distance of the Site, including Down Lane Park, Lee Valley Regional Park, Tottenham Marshes and Markfield Park.
- 51 This is reinforced by the position of the London Borough of Haringey relative to the established Epping Forest SAC mitigation framework. Unlike the London Boroughs of Enfield, Newham, Redbridge and Waltham Forest, which directly adjoin the SAC and are signatories to the Epping Forest SAC SAMMs Partnership Agreement with adopted tariffs in place, Haringey falls only partly within the outer edge of the 6.2 km Zol and is not a party to that Partnership Agreement. This reflects the borough's comparatively limited contribution to recreational pressure on the SAC, consistent with the negligible visitor and population-based contribution identified above.
- 52 On this basis, and notwithstanding the precautionary approach ordinarily applied to in-combination assessments, the scale of the Proposed Development's contribution is not considered sufficient, either alone or in combination with other plans and projects within the 6.2 km Zol, to give rise to a likely significant effect upon Epping Forest SAC.
- 53 As a result, an Appropriate Assessment is not required in respect of recreational impacts upon Epping Forest SAC. As set out above, with a range of control measures in place to manage recreational impacts on the Lee Valley SPA and Ramsar, impacts from the Proposed Development in-combination with other plans and projects are not considered likely to have a significant effect on the European site.

Lee Valley SPA and Ramsar

- 54 As set out above, with a range of control measures in place to manage recreational impacts on the Lee Valley SPA and Ramsar, impacts from the Proposed Development in-combination with other plans and projects are not considered likely to have a significant effect on the European site.
- 55 As a result, the Proposed Development is not considered likely, either alone or in-combination with other plans and projects, to have a likely significant effect as a result of recreation activities.

Air Quality

- 56 The traffic generation associated with the Proposed Development (c. 80 AADT, 1.3% of which comprises HDV movements) falls significantly below the screening criteria provided by the IAQM of an AADT of 1,000 vehicles or 200 HDV, with the influence on local air quality unlikely to result in a 1% change in critical loads/levels which is identified in the IAQM guidance as widely used to define a reasonable quantum of long-term pollution which is not likely to be discernible from fluctuations in background/measurements.

- 57 Whilst there are a number of main roads that are closely associated with Epping Forest SAC, considering the location of the Proposed Development those that may reasonably be utilised by traffic would include the A406 North Circular or the A503 Forest Road. The A406 North Circular and A503 Forest Road both provide route options linking the site towards the east and north-east, providing the main route to north-east London and the M11 from the site and has an AADT of 124,152 vehicles in 2025 for the A406 (Point Count 37116) and an AADT of 13,272 vehicles in 2025 for the A503 (Point Count 47246). The A12, accessible via the A503 Forest Road, provides access to the east and south-east, and has an AADT of 72,375 vehicles for 2025 (Point Count 73906).
- 58 The AADT generated by the Proposed Development will be spread across the road network, rather than focused on a single road, however if all 80 AADT were to utilise the A406 North Circular the additional traffic would comprise 0.06% of the AADT. This falls below the Decision-Making Threshold (DMT) identified by JNCC in best practice guidance¹⁸ as the level at which the contribution from an individual source can be ignored for the purpose of decision-making as the combined effects of proposals excluded by it will not undermine the achievement of the conservation objectives and can be screened out of further assessment in respect to in-combination effects. Similarly, if all 79 AADT were to utilise the A12, the addition traffic would comprise 0.11% of the AADT and fall below the DMT.
- 59 As the A503 comprises a significantly smaller route with limited destination options compared to the main routes discussed above, it is reasonable to assume that fewer vehicles are likely to utilise this route. Assuming 20% of vehicles generated were to utilise this route, which is conservative given the various faster transport routes available and distribution of vehicles around the network, the additional traffic would comprise around 0.12% of the AADT and fall below the DMT identified by JNCC.
- 60 Any vehicles utilising the M25 where it crosses Epping Forest will fall significantly below the 0.15% threshold.
- 61 Considering the location of the Proposed Development, and route options for vehicle trips generated by the Proposed Development, it is reasonable to assume that traffic flows within 200 m of Epping Forest SAC will be equal to or less than the identified maximum AADT, and therefore the Proposed Development will not have any contribution towards in-combination effects associated with air pollution on Epping Forest SAC.
- 62 The Outline Construction Logistics Plan identifies that construction traffic will route via the A10 (connecting to the A406 North Circular) and A503 Forest Road, bringing HGVs within 200m of Epping Forest SAC. Construction activity is predicted to generate an average of 18 HDV AADT during peak construction. Even under a worst-case scenario where all construction HGVs use these specific routes, which is unlikely as trips will naturally disperse across the wider network, this volume represents a negligible increase of approximately 0.014% against baseline traffic flows for the A406 and 0.14% for the A503. This falls well below the JNCC Decision-Making Threshold (DMT)¹ and remains substantially below the IAQM screening threshold of 200 HDV AADT. Consequently, the Proposed Development will not make a measurable contribution towards in-combination air quality effects on Epping Forest SAC during construction and can therefore be screened out of the assessment.

Noise

- 63 As the Proposed Development will have negligible influence on the noise environment at the SPA and Ramsar as a result of the attenuation of noise across the distance between the site and the European site, it will also have a negligible influence on any cumulative effects. As a result, the Proposed Development will not have any contribution towards in-combination effects associated with the construction phase of the development.

¹⁸ Joint Nature Conservation Committee (2021) *Technical Report – Decision-Making Thresholds for Air Pollution*. December, 2021.

Summary

- 64** The Screening Assessment concludes that the Proposed Development is not likely to have significant effects, either alone or in-combination with other projects and plans, upon the Epping Forest SAC nor Lee Valley SPA and Ramsar.

CONCLUSION

- 65** A summary of the sHRA, comprising the findings of the screening assessment, is provided in Table 3 confirming that the Proposed Development is not likely to result in likely significant effects upon Epping Forest SAC or Lee Valley SPA and Ramsar, both alone and in-combination with other plans and projects, and no further Appropriate Assessment is required.

Table 3 Summary of Potential Significant Effects on Qualifying Features

Site	Qualifying Feature	Potential for Likely Significant Effects	Likely Significant Effect from Scheme Alone	Likely Significant Effect In-combination
Epping Forest SAC	Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) (beech forests on acid soils) - the presence of this Annex I habitat within the site is a primary reason for the designation of the site, representing the habitat in the north-eastern part of the habitat's UK range. Although epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i> . The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.	Recreation	No	No
		Air Quality	No	No
	European dry heaths – the presence of this Annex II species within the site is a primary reason for designation of the site, with the large woodland area of Epping Forest providing habitat in which records of the species are widespread and frequent.	Recreation	No	No
		Air Quality	No	No
	Northern Atlantic wet heaths with <i>Erica tetralix</i> the presence of this Annex I habitat within the site comprises a qualifying feature but not a primary reason for designation. Wet heaths typically occur on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage. The vegetation is typically dominated by mixtures of cross-leaved heath (<i>Erica tetralix</i>), heather (<i>Calluna vulgaris</i>), grasses, sedges and <i>Sphagnum</i> bog-mosses.	Recreation	No	No
		Air Quality	No	No
Lee Valley SPA	Stag beetle (<i>Lucanus cervus</i>) – the presence of this Annex II species within the site is a primary reason for designation of the site, with the large woodland area of Epping Forest providing habitat in which records of the species are widespread and frequent	Recreation Other Ecosystem Modification (Removal of deadwood)	No	No
	Article 4.1 – The site is used regularly by 1% or more of the Great Britain population of a species listed on Annex I, in any season: bittern (<i>Botaurus stellaris</i>) (6% of GB population) during the winter.	Recreation	No	No
	Article 4.2 – The site is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex I), in any season: shoveler (<i>Anas clypeata</i>) (1.0% of NW/Central Europe population) and gadwall (<i>Anas strepera</i>) (1.5% of NW Europe population), both during the winter.	Recreation	No	No

Site	Qualifying Feature	Potential for Likely Significant Effects	Likely Significant Effect from Scheme Alone	Likely Significant Effect In-combination
Lee Valley Ramsar	Criterion 2 - The site supports the nationally scarce plant species whorled water-milfoil (<i>Myriophyllum verticillatum</i>) and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman).	Recreation	No	No
	Criterion 6 – The site supports species/populations at levels of international importance, including northern shoveler with peak counts in the spring/autumn and gadwall with peak counts in the winter.	Recreation	No	No

Site	Qualifying Feature	Potential for Likely Significant Effects	Likely Significant Effect from Scheme Alone	Likely Significant Effect In-combination
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		Air Quality	No	No
	European dry heaths – the presence of this Annex II species within the site is a primary reason for designation of the site, with the large woodland area of Epping Forest providing habitat in which records of the species are widespread and frequent.	Recreation	No	No
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	Criterion 6 – The site supports species/populations at levels of international importance, including northern shoveler with peak counts in the spring/autumn and gadwall with peak counts in the winter.	Recreation	No	No

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